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September 17, 2015

VIA ECF

Hon. Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007

Re: Ortiz *et al.* v. Re Spec Corp. d/b/a Jackson Hole, *et al.*
Consolidated Case No.: 14-CV-270 (AJN)(RLE)

Dear Judge Nathan:

As Your Honor is aware, this firm represents Defendants Re Spec Corp., 3K Foods Inc., Thomas Kalogeras, George Kalogeras and Demetri Kalogeras (“Defendants”) in the above-referenced action. We are in receipt of Plaintiffs’ trial testimony declarations. In accordance with Your Honor’s Individual Rules of Practice, Rule 5.F.iii, Defendants advise that they intend to examine the following Plaintiffs at the trial scheduled to commence on October 5, 2015:

- Jose Ortiz
- Genaro Vasquez
- Alberto Ortega
- Jorge Ponce
- Maurilio Vasquez
- Juan Acosta
- Iginio Arellanes
- Fernando Arellanes
- Arnulfo Vasquez Basurto
- Edgar Juarez
- Ray Mundo Vasquez.

Additionally, while counsel for Plaintiffs withdrew from representing Plaintiff Edgar Garcia and there is no evidence with respect to Mr. Garcia in the record, to the extent Mr. Garcia remains a Plaintiff in this case, should Mr. Garcia be permitted to give testimony, Defendants intend to cross-examine Mr. Garcia at trial. Defendants reserve the right to seek dismissal of Mr. Garcia’s claims at the appropriate time.



Ltr to Judge Nathan
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We thank the Court for its attention to this matter.

Very truly yours,

ELLENOFF GROSSMAN & SCHOLE LLP

A handwritten signature in black ink, appearing to be "Amanda M. Fugazy", written over a light blue horizontal line.

Amanda M. Fugazy

cc: Shawn R. Clark, Esq. (via ECF)